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States Government

Department of Energy

DUE  
DATE 3-20-92

## Memorandum

MAR 3 3 54 PM '92 Rocky Flats Office

ACTION Kersh

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KERSH, J.M.	X
KIRBY, W.A.	
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KUESTER, A.W.	
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SANDLIN, N.B.	
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SULLIVAN, M.T.	
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MAR 02 1992

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

ERD:BKT:2287

Environmental Evaluations Within the Production Areas of the Rocky Flats Plant

J. M. Kersh, Associate General Manager  
Environmental and Waste Management  
EG&G Rocky Flats, Inc.

We request that the Environmental Evaluation (EE) portion of the RFI/RFI Work Plans for OUs 8, 9, 10, 12, 13, 14, 15 and 16 be modified per the RFP Risk Assessment Technical Working Group meeting held on February 21, 1992. At this meeting, it was agreed by DOE/RFO, EPA, CDH, FWS and EG&G that EEs for production area OUs would utilize the following format:

- 1) Habitat Survey Report for compliance with the Migratory Bird Treaty Act and Fish and Wildlife Coordination Act. If necessary, this report will be broadened to include additional species beyond migratory birds. In addition, this report should be consistent with RFP Ecology SOP 5.11, Habitat Types.
- 2) Biological Survey Report for compliance with the Endangered Species Act. Whether this report is prepared or not is a function of the results of the Habitat Survey Report. If there is no habitat present for RFP federal SOC species, this report will be unnecessary. A decision not to prepare this report should have the concurrence of DOE and FWS. However, if habitat for Federal SOC species is present, this report will be required. In this case, the report should be consistent with the RFP Ecology SOPs for threatened, endangered and SOC species (NEPA.12 and FO.21).
- 3) Evaluation of exposure pathways including a site conceptual model.

Since OU 9 is the first production area OU to have a RFI/RI Work Plan prepared, we request that the revised EE format be first applied at this OU. This will be submitted to the regulators and Natural Resource Trustees as a technical memorandum to replace the existing EE Work Plan in the OU 9 Phase I RFI/RI Work Plan document. We request that the revised EE Work Plan for the OU 9 RFI/RI Work Plan be submitted to DOE/RFO/ERD by March 20, 1992, for submittal to the regulators and trustees for their review and approval. Once approved, this document should form the basis for EE Work Plans at OUs 8, 10, 12, 13, 14, 15 and 16. Note that OUs 8, 10, 12 and 13 have IAG deliverable dates in May 1992. Thus, you should be prepared to incorporate the revised EE format into these documents without missing the IAG milestones.

CORRES CONTROL  
TRAFFICReviewed for Addressee  
Corres. Control RFP

3-3-92 CM

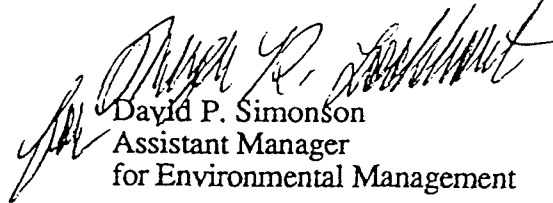
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ADMIN RECORD

A-0009-000055

Questions or concerns regarding this memorandum especially with regard to the results of the RFP Risk Assessment Technical Working Group meeting should be directed to Bruce Thatcher of my staff at 966-3532.

  
David P. Simonson  
Assistant Manager  
for Environmental Management

cc:

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S. Nesta, EG&G/RF  
D. Flory, EG&G/RF  
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